

EXHIBIT A

Kelman, Leah

From: King, David <dking@herrick.com>
Sent: Wednesday, June 20, 2018 1:18 PM
To: Michael Ansell
Cc: Josh Bauchner; Silverman, Daniel S. (DSSilverman@Venable.com); Gurvitz, Matthew M. (MMGurvitz@Venable.com); Gabriel, Elise (EMGabriel@Venable.com); Kim Richman (krichman@richmanlawgroup.com); Clark Binkley (cbinkley@richmanlawgroup.com)
Subject: RE: Hall v. Welch's - Request for consent to pro hac vice admission

Michael – we are surprised and disappointed by the Plaintiff's decision to refuse to consent to the *pro hac vice* admission of the Venable attorneys. As you know, these attorneys have been lead counsel representing the Defendants in the *Hall* and *Atik* cases pending in EDNY for several years, in which court Messrs. Silverman and Gurvitz were admitted pro hac vice (Ms. Gabriel is a member of the NY Bar). It is patently unfair and improper to seek to deny our clients the benefits of their knowledge and experience of these matters simply because the case has been returned to the state where your client originally brought her claims.

We would prefer to avoid the cost and inconvenience, both to our clients and to the Court, of unnecessary motion practice on the issue. We do not see how the Court or the parties will benefit from your refusal to consent to letting the defendants be represented by the counsel of their choice, and by adding to the Court's burden. While you can have your opinions, we totally disagree -- vehemently -- with the statement that any of these lawyers have sought to intimidate or harass any parties or witnesses in this litigation or any other. In any event, you are objecting to the admission of attorneys who have excellent reputations and pristine ethical histories in their home states, which you do not dispute.

We also note that Mr. Richman and Mr. Binkley's bios do not state that they are admitted to practice in the District of New Jersey. If they are in fact not admitted, and should your client wish for them to continue representing her as counsel, we will consent to their admission because, like Mr. Silverman, Mr. Gurvitz, and Ms. Gabriel, they are skilled and professional attorneys who meet the requirements for *pro hac vice* admission in New Jersey. We are not going to add to the Court's burden with senseless motion practice as to Messrs. Richman and Binkley's admission, and stand in the way of parties being represented by counsel of their choice.

Please let us know if you will reconsider our request to consent to the admission of the Venable attorneys. If not, we will file a motion to have them admitted, and advise the Court that you have refused to consent. Thank you.



David R. King
Partner
Herrick, Feinstein LLP
One Gateway Center | Newark, NJ 07102
973.274.2002 Office
DKing@herrick.com
[website bio](#)

From: Michael Ansell [mailto:mha@ansellgrimm.com]
Sent: Wednesday, June 20, 2018 9:33 AM
To: King, David <dking@herrick.com>
Cc: Josh Bauchner <jb@ansellgrimm.com>
Subject: RE: Hall v. Welch's - Request for consent to pro hac vice admission

David,

As you and I previously discussed, as much as we wish we could improve the cooperation in this case, based on Mr. Silverman's history of denying professional courtesies, we are obligated to do the same. We also take exception to Mr. Silverman's tactics intended to harass and intimidate parties and witnesses.

Michael H. Ansell, Esq.

Ansell Grimm & Aaron, P.C.

t: (973) 247-9000

[Bio](#) | [V-Card](#) | [Website](#)

From: King, David [<mailto:dking@herrick.com>]

Sent: Wednesday, June 20, 2018 9:08 AM

To: Michael Ansell <mha@ansellgrimm.com>

Subject: Hall v. Welch's - Request for consent to pro hac vice admission

Hi Michael – I hope you are well. We will be asking the DNJ to admit *pro hac vice* three lawyers from the Venable firm in the case, Dan Silverman, Matt Gurvitz, and Elise Gabriel. Can you let us know whether we can advise the Court that the plaintiff consents to their admission?

Thank you.



David R. King

Partner

Herrick, Feinstein LLP

One Gateway Center | Newark, NJ 07102

973.274.2002 Office

DKing@herrick.com

[website](#) [bio](#)

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